

UNITED STATES DISTRICT COURT  
 DISTRICT OF SOUTH CAROLINA  
 (SPARTANBURG DIVISION)

JANE DOES 1-9, )  
 Plaintiff/Petitioner/USA, )  
 )  
 v. )  
 )  
 COLLINS MURPHY, SHARON HAMMONDS, )  
 BRENDA F. WATKINS, LIMESTONE UNIVERSITY, )  
 MG FREESITES, LTD., d/b/a PORNHUB.COM, )  
 MG FREESITES II LTD., MINDGEEK S.A.R.L., )  
 MINDGEEK USA, INC., MG BILLING LTD., )  
 and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM, )  
 TRAFFICSTARS LTD., WISEBITS LTD, )  
 XHAMSTER IP HOLDINGS LTD, WISEBITS IP LTD, )  
 Defendant/Respondent. )  
 \_\_\_\_\_, )  
 \_\_\_\_\_,

Case No. 7:20-cv-00947-JD

**Motion  
 in Support of  
*Pro Hac Vice* Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Christen M. Price be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of Columbia federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.

5. Certification of Consultation (Local Civil Rule 7.02).

Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion:  will likely oppose;  does not intend to oppose

Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

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No duty of consultation is required because the opposing party is proceeding pro se.

Bell Legal Group, LLC.  
 Firm Name  
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 Name of Local Counsel  
s:/ J. Edward Bell, III  
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Local Counsel for the Plaintiff

District of South Carolina

Federal Bar Number: 1280